

DAVISON DESIGN &
DEVELOPMENT, INC.,

V.

Defendant.

$$\begin{array}{c}) \\) \\) \\) \\) \\) \\) \\) \\) \end{array}$$

Honorable Marilyn J. Horan

Exhibit 1: July 2023 emails

From: [Justin Barron](#)
To: [Stacey Barnes](#)
Cc: jmyers@eckertseamans.com; [Vikesh Patel](#); wyarbrough@kmd.law; [Shannon Frizzell](#)
Subject: Re: Activity in Case 2:23-cv-00644-MJH DAVISON DESIGN & DEVELOPMENT, INC. v. SCORZA Initial Local Rule 16.1 Scheduling Order
Date: Thursday, July 13, 2023 4:09:00 PM

We are going to file this motion tomorrow to allow Judge Horan some time to review it (and perhaps rule on it) prior to our Monday, July 17 deadline to file the Rule 26(f) Report and other documents she ordered us to file.

If you have any proposed changes, provide them by 12:00 EST tomorrow to give us time to try to finalize and file the motion tomorrow.

[Justin T. Barron](#)
[Barron Law Office LLC](#)
[P.O. Box 493](#)
[Valencia, PA 16059](#)
jbarron@justinbarronlaw.com
[412-334-6312](tel:412-334-6312)

From: Stacey Barnes <sbarnes@kmd.law>
Sent: Friday, July 7, 2023 10:10:13 AM
To: Justin Barron <jbarron@justinbarronlaw.com>
Cc: jmyers@eckertseamans.com <jmyers@eckertseamans.com>; [Vikesh Patel](#) <vpatel@kmd.law>; wyarbrough@kmd.law <wyarbrough@kmd.law>; [Shannon Frizzell](#) <sfrizzell@kmd.law>
Subject: Re: FW: Activity in Case 2:23-cv-00644-MJH DAVISON DESIGN & DEVELOPMENT, INC. v. SCORZA Initial Local Rule 16.1 Scheduling Order

Dear Justin:

I agree that discovery is not needed and that a motion to stay discovery is appropriate. I'll review your motion in detail and get back to you any revisions I have.

Sincerely,

Stacey L. Barnes
Senior Attorney, Business Law & Litigation

Kearney, McWilliams & Davis, PLLC
55 Waugh Drive, Suite 150, Houston, Texas 77007
Denver Energy Center, 1625 Broadway, Suite 2950, Denver, Colorado 80202
Office: (713) 936-9620 x121 • Fax: (832) 413-5405 • Cell: (713) 301-5117
www.kmd.law

NOTICE: This E-mail (including attachments) is covered by the Electronic Communications Privacy Act, 18 U.S.C. 2510-2521, 2701-2710, is confidential, and may be legally privileged. If you are not the intended recipient, you are hereby notified that any

retention, dissemination, distribution, or copying of this communication is strictly prohibited. Please reply to the sender that you have received the message in error, then delete it.

On Wed, Jul 5, 2023 at 2:54 PM Justin Barron <jbarron@justinbarronlaw.com> wrote:

Counsel,

We intend to file the attached motion to seek a stay of discovery and the other normal pretrial procedures contemplated by the Court's June 29 Scheduling Order.

Consistent with paragraph 1 of Judge Horan's Standing Order on Civil Motion Practice, we're seeking your position on the motion. Please advise whether the motion can be presented as joint, consent, or uncontested.

We left brackets in the proposed order for the dates by which briefs are to be filed. We'd propose 30 days from the July 24 scheduling conference, or **August 23**, for your brief in opposition; and 14 days from your filing, or **September 6**, for our reply brief.

Justin T. Barron

Barron Law Office LLC

P.O. Box 493

Valencia, PA 16059

jbarron@justinbarronlaw.com

412-334-6312

This email transmission and any documents, files, or items attached to it are confidential and protected by the attorney-client privilege and/or work product doctrine. It is intended only for the designated recipient. If you are not the intended recipient, you are hereby notified that any copying, disclosure, review, or use of the information contained in or attached to this email is strictly prohibited. If you have received this transmission in error, please notify us immediately at 412-334-6312 or jbarron@justinbarronlaw.com.

From: ecf_intake_pawd@pawd.uscourts.gov <ecf_intake_pawd@pawd.uscourts.gov>

Sent: Thursday, June 29, 2023 2:31 PM

To: pawd_ecf@pawd.uscourts.gov

Subject: Activity in Case 2:23-cv-00644-MJH DAVISON DESIGN & DEVELOPMENT, INC. v. SCORZA
Initial Local Rule 16.1 Scheduling Order

This is an automatic e-mail message generated by the CM/ECF system. Please DO NOT RESPOND to this e-mail because the mail box is unattended.

*****NOTE TO PUBLIC ACCESS USERS***** Judicial Conference of the United States policy permits attorneys of record and parties in a case (including pro se litigants) to receive one free electronic copy of all documents filed electronically, if receipt is required by law or directed by the filer. PACER access fees apply to all other users. To avoid later charges, download a copy of each document during this first viewing. However, if the referenced document is a transcript, the free copy and 30 page limit do not apply.

U.S. District Court

Western District of Pennsylvania

Notice of Electronic Filing

The following transaction was entered on 6/29/2023 at 2:30 PM EDT and filed on 6/29/2023

Case Name: DAVISON DESIGN & DEVELOPMENT, INC. v. SCORZA

Case Number: [2:23-cv-00644-MJH](#)

Filer:

Document Number: [10](#)

Docket Text:

INITIAL LOCAL RULE 16.1 SCHEDULING ORDER: Rule 26 Meeting Report due by 7/17/2023; Telephonic Initial Case Management set for 7/24/2023 at 09:00 AM. Signed by Judge Marilyn J. Horan on 6/29/2023. (Attachments: # (1) Exhibit, # (2) Exhibit) (bjl)

2:23-cv-00644-MJH Notice has been electronically mailed to:

John J. Myers jmyers@eckertseamans.com

Justin T. Barron jbarron@justinbarronlaw.com

2:23-cv-00644-MJH Filer must deliver notice by other means to:

The following document(s) are associated with this transaction:

Document description:Main Document

Original filename:n/a

Electronic document Stamp:

[STAMP dcecfStamp_ID=1098469114 [Date=6/29/2023] [FileNumber=8193212-0]
] [cad2c018de3a795d2e2d88101b5144053d11ce2241847b7e7c13a070ff12161d6d3
02d540ee7a029851d4919be92d5a1cc957a152a5f3deb0917729c93c22694]]

Document description:Exhibit

Original filename:n/a

Electronic document Stamp:

[STAMP dcecfStamp_ID=1098469114 [Date=6/29/2023] [FileNumber=8193212-1]
] [b1c3504e122e8989f4012a93537a73f2d61b41ddabd9e22e614c105ee02e468066c
44964eaf4cd08adbed6d51dee55550a862ebedee7541d888ac07dc86095a6]]

Document description:Exhibit

Original filename:n/a

Electronic document Stamp:

[STAMP dcecfStamp_ID=1098469114 [Date=6/29/2023] [FileNumber=8193212-2]
] [0b20d536af9200131dbae5d6cb4cdad882615da9d1b0748f6afb4faf438d4c680b3
45081c252b8afca715c71c0bbf27a82a298b1dd5b25826eaf7241230149bb]]